



ASSOCIATION OF
BAY AREA GOVERNMENTS



METROPOLITAN
TRANSPORTATION
COMMISSION

December 10, 2009

Cynthia Bryant
Director
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, California 95814

Re: Comments on Draft Urban Greening Grant Guidelines for Projects and Plans

Dear Ms. Bryant:

On behalf of the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC), we thank you for this opportunity to comment on the Draft Urban Greening Grant Guidelines for Projects and Plans put forth by the Strategic Growth Council. The goals of the Strategic Growth Council align well with our regional agencies' efforts to promote a sustainable development pattern in the San Francisco Bay Area through integrated transportation and land use planning. Our comments encourage the Strategic Growth Council to revise the evaluation/scoring criteria for the Urban Greening Grant Guidelines for Projects in order to make real, strategic investments that leverage state, regional, and local investments for creating sustainable communities.

Through the San Francisco Bay Area's Regional Blueprint Plan called FOCUS, which is partially funded through the State's Regional Blueprint Program, ABAG and MTC have been strategically coordinating funding programs and assistance to support local governments and transit agencies in the planning and development of areas as complete communities. Regional and local support exists for this strategy because it is voluntary and incentive based. Through local nominations and regional adoption, Priority Development Areas (PDAs) and Priority Conservation Areas (PCAs) have been adopted and recognized as a policy priority to funnel incentives and assistance to these areas. PDAs are infill locations that can accommodate more housing near transit, and PCAs are regionally significant natural resource lands that have an urgent need for protection in the near-term. By investing in the planning and development of these areas as sustainable communities, local, regional, and state sustainability goals can be accomplished.

A major challenge to creating sustainable communities is providing quality green spaces in urban areas for people to enjoy. The Strategic Growth Council has the opportunity to advance the greening of urban areas by investing in communities that have already

demonstrated a commitment to creating sustainable communities by participating in FOCUS but only need more planning assistance or funding to implement their vision. Please work with us to make strategic investments in Priority Development Areas and Priority Conservation Areas.

ABAG and MTC staff would like to offer the Strategic Growth Council the following specific comments on the draft program guidelines, dated November 17, 2009.

Urban Greening Grant Guidelines for Planning

- We support the minimum eligibility requirement for urban greening plans to be consistent with the relevant regional plan. In the San Francisco Bay Area, the regional blueprint plan is called FOCUS. To be consistent with this plan and the grant guidelines, a jurisdiction would have an adopted Priority Development Area or Priority Conservation Area in an urban area. Several regional programs have already been integrating their initiatives with FOCUS, such as the Regional Transportation Plan, the San Francisco Estuary Partnership's CCMP, the San Francisco Bay Trail, and the Coastal Conservancy's San Francisco Bay Program to name a few examples.
- We believe the process for determining consistency with a regional plan adopted as part of awarding Proposition 1C funds through the State HCD TOD and Infill Infrastructure Grant Programs worked well. The relevant COG/MPO provided a letter confirming consistency with the regional plan. We encourage you to adopt this process for determining consistency with a regional plan. We would also be happy to work with the Council on the review of applications.

Urban Greening Grant Guidelines for Projects

- The evaluation/scoring criteria are too general and miss an opportunity to leverage state, regional, and local investments.
 - Under Scoring Criteria #2 Urban Greening Statutory Priorities, consistency with a regional blueprint plan can be emphasized as demonstrating integration/collaboration in the first sub-bullet. Consistency with a regional blueprint plan demonstrates strong collaboration and links local, regional, and state priorities.
 - To determine consistency with a regional blueprint plan, we encourage the Council to adopt the process outlined above that was used in the grant application process for awarding Proposition 1C funds through the State HCD TOD and Infill Infrastructure Grant Programs.
 - ABAG and MTC would again be willing to provide applicants with a letter confirming consistency with a regional plan and work with the Council on the review of applications.
- The guidelines should not exclude eligible applicants from partnering with Councils of Governments or other entities as co-applicants. Given potential capacity issues at the local level to take on new projects due to budget cuts, partnerships can help local

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governments in the development of grant applications and in seeing projects through to completion.

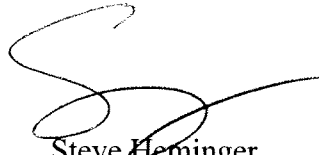
We also encourage the Strategic Growth Council to host an application workshop in the San Francisco Bay Area. ABAG and MTC can help find a meeting location and assist with workshop outreach.

Please do not let this opportunity to collaboratively and strategically direct funding for the creation of sustainable communities pass. We encourage you to contact us with any questions.

Sincerely yours,



Henry L. Gardner
Executive Director
Association of Bay Area Governments



Steve Heminger
Executive Director
Metropolitan Transportation Commission

Cc: Members, Strategic Growth Council